

**THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI
JACKSON DIVISION**

KEN FLYNT

PLAINTIFF

VS.

CIVIL ACTION NO: 3:11CV22HTW-LRA

BIOGEN IDEC, INC.

DEFENDANT

AFFIDAVIT OF KEN FLYNT

1. My name is Ken Flynt. I am over the age of eighteen years old.

I state the following based upon my own personal knowledge and am competent to testify as to these matters.

2. I was employed with Defendant from January 2008 until November 25, 2009.

3. In 2009, I was diagnosed with depression and anxiety regarding the hostile work environment I was subjected to by my former supervisor.

4. This medical condition caused me to suffer several symptoms, such as, (1) projectile vomiting, (2) diarrhea and (3) panic attacks.

5. To this day I still suffer panic attacks because of the hostile work environment I was subjected to. When I have these panic attacks I have to take medication that makes me drowsy and fall asleep.

6. When my doctor recommended that I could go back to work if I was placed under a different supervisor I was not aware that it was not a reasonable accommodation under the ADA, and I was not aware what could be considered a reasonable accommodation under the law.

7. Had the Defendant truly engaged in the interactive process to determine if

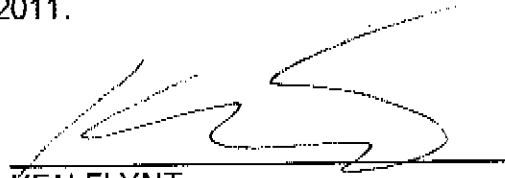
a reasonable accommodation could be made I would have been able to return to work.

8. The Defendant could have spent time trying to find out what actions Mr. Richards took to create the hostile work environment, and had him change his management style so that I could work in a hostile free work environment so that I could work with my disability.

I declare under penalty of perjury that the above and foregoing is true and correct as therein stated.

Further Affiant saith not.

Executed this the 5th day of December, 2011.



KEN FLYNT